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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

January 11, 1995

EX PARTE

William F. Caton
Acting Secretary
Federal Communications Commission
Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Mr. Caton:

Re: *CC Docket No. 94-54, Equal Access and Interconnection Pertaining to
Commercial Mobile Radio Services*

On behalf of Pacific Bell, please find attached its written ex parte presentation in response to concerns raised during Pacific's December 13 and 14 meetings with Commission staff to discuss the above-referenced proceeding. Please associate this material with this proceeding.

We are submitting two copies of this notice in accordance with Section 1.1206(a)(1) of the Commission's Rules.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Attachment

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James P. Terhill
Senior Counsel

Legal Department
140 New Montgomery Street
San Francisco, California 94105
(415) 542-7664

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JAN 11 1995

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

January 11, 1995

Nancy Boocker, Legal Advisor to Chief
Donald H. Gips, Deputy Chief
Myron C. Peck, Deputy Chief
Dan Phythyon, Senior Legal Assistant
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Ms. Boocker, Messrs. Gips, Peck, Phythyon:

When we met on December 13th and 14th you asked us some questions about number transferability which we were unable to answer at that time. Mr. Peck also called a few days later and asked a couple of further questions. I am getting back to you with our answers. The holidays have delayed my response.

We explained our need to obtain our own NXX codes and place them on cellular facilities. We would resell cellular service, and then migrate our customers to our own facilities once they are built. This capability would help mitigate the 10 to 12 year head start cellular has over PCS which AirTouch has bragged about. I wanted to also tell you that since my meetings with you, LA Cellular appears to be willing to accommodate our request. GTE would allow us to place our own NXX codes on its facilities, but since we are bound to the equal access requirement (which they are not), we aren't in a position to resell their cellular service. AirTouch is the only cellular carrier we have been speaking to which has refused to allow us to resell with our own NXX code.

You asked 1) Would Pacific Bell assign NXX codes to other resellers? 2) What do Bellcore guidelines say about assigning NXX codes to other resellers? 3) What's involved in registering our own NXX codes on cellular facilities? And, 4) what's involved when we transfer customers to our own facilities?

The process is as follows. First, we ask Pacific Bell for NXX codes in the NPAs (such as 213, 415, or 510) in which we want to provide service. An NXX code is ten thousand numbers. Pursuant to policies developed by the Industry via the Industry Numbering Committee, Pacific Bell, as code administrator, would assign Pacific Bell Mobile Services the codes provided it is a certified carrier. It takes approximately 111 days to have Pacific Bell provision an NXX code. This is because national databases have to be updated with NXX

code information so calls can be routed and billed. Bellcore maintains and updates the Local Exchange Routing Guide that contains this data. The data tells where the NXX code resides, who holds the code, and other relevant information needed for routing and billing. The data base is maintained using six digits--NPA-NXX.

Pacific Bell would do this for any wireless carrier which files a registration statement with the California Public Utilities Commission and meets the existing industry approved central office code guidelines. These guidelines have been adopted by the Industry Carrier Compatibility Forum/Industry Numbering Committee (ICCF/INC), document ICCF 93-0729-010, 10-26-94. Membership is open to the telecommunications industry.

As you know, Congress preempted state entry regulation in the Omnibus Budget Reconciliation Act of 1993. Because of that, we only have to file a registration statement with the California Public Utilities Commission that lists certain basic information such as name, location, and telephone number. Pacific Bell would issue NXX codes to any wireless carrier that files that statement and meets the ICCF/INC guidelines. The ICCF/INC CO Code Assignment Guidelines do not explicitly deal with "registration," but, the intent of the guidelines is to have carriers either be certified or registered as required by appropriate regulatory authority. Pacific Bell will introduce language to the Industry Numbering Committee to update the current Guidelines to reflect the requirements of the Omnibus Budget Reconciliation Act of 1993. Bellcore, as the North American Numbering Plan Administrator, does not issue guidelines itself on NXX code assignment but participates in the ICCF/INC.

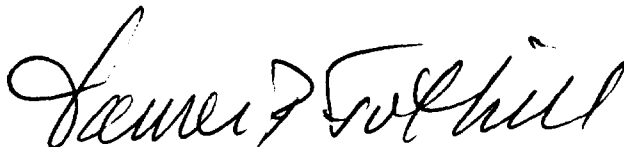
Next, we ask the cellular carrier to load the NXX codes into its Home Location Register (HLR). This is done via predefined software messages. The cellular carrier would follow the same steps it follows to load its own NXX codes into its HLR. Each cellular phone has an Electronic Serial Number (ESN) which is "burned" into the chip in the phone; the ESN is not changeable. To activate service, the ESN is matched with a Mobile Identification Number (MIN.) The MIN is simply the cellular phone's ten-digit number--NPA-NXX-XXXX. The MIN is programmable in the phone. Once the NXX is loaded into the HLR, the cellular operator matches the ESN with one of the MINs in the NXX block, and the customer has service. This responds to the third question.

Numbers and customers are moved to our facilities by moving the entire NXX code: it is removed from the cellular carrier's HLR and programmed into our HLR. The reason that the entire code must be moved is because at present the national routing and rating databases and Local Exchange Carrier operational support systems are not designed at this time to analyze digits beyond the NPA-NXX. The systems simply can't recognize ten digits, NPA-NXX-XXXX. The Industry Numbering Committee, via the Number Portability Workshop, is currently addressing the technical issues associated with transferring (porting) individual numbers from one carrier to another.

We would not force customers to move to our system. If a customer wants to remain on cellular service, we will re-route the customer's service to the cellular provider. Because we can't leave individual customer numbers on the cellular provider's HLR, (because we can't do ten digit recognition) we will move the numbers as explained above, but via a direct link with the cellular provider, route those customers' calls back to that cellular provider. We will do this at our expense, and it will be transparent to the customer. The customer will retain his or her number and receive cellular service.

If I have overlooked something, or clarity or elaboration are needed, please let me know. Thank you for your considering our views.

Yours truly,

A handwritten signature in black ink, appearing to read "James P. Tuthill". The signature is fluid and cursive, with the first name "James" being the most prominent part.

James P. Tuthill
Senior Counsel

cc: Gregory Rosston, Andrew Sinwell and Florence O. Setzer